

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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IN RE:	:	
Alejandro Abad-Kelly	:	Case No.: 17-14373-AMC
	:	
Debtor	:	Chapter 13

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**EXPEDITED MOTION FOR AUTHORITY TO SELL REAL PROPERTY FREE AND  
CLEAR OF LIENS AND ENCUMBRANCES**

NOW INTO COURT COMES, Alejandro Abad-Kelly, hereinafter referred to as “Debtor”, and brings this Motion to Sell Real Property under Eastern District of Pennsylvania Local Rule 6004-1 and Section 363 of the United States Bankruptcy Code and in support thereof avers the following:

1. Debtor commenced the instant Chapter 13 matter on June 27, 2017 by filing a Voluntary Petition.
2. The Chapter 13 Plan was confirmed on January 4, 2018.
3. The subject real property is located at 1901 West Diamond Street, Philadelphia, PA (hereinafter referred to as “the property”) and is owned by the Debtor.
4. Debtor believes it to be in his best financial interest to sell the property.
5. In furtherance of the sale, Debtor retained the services of Peter McNicholas, a licensed realtor with Homestarr Realty, Warrington, PA.
6. On or about October 25, 2021, Debtor, by and through his realtor entered into an Agreement of Sale of the property in the amount of \$485,000.00. A true and correct copy of the Agreement of Sale is attached hereto and labeled as **Exhibit “A.”**

7. On or about November 6, 2021, Debtor, entered into an Addendum to Agreement of Sale of the property for the change of purchase price from the amount of \$485,000.00 to \$450,000. A true and correct copy of the Addendum to the Agreement of Sale is attached hereto and labeled as **Exhibit “B.”**

8. The settlement date for the sale of the subject property is scheduled for December 10, 2021 and therefore an expedited hearing is humbly requested.

9. The Buyer, Shatee J. Cooks, is not an insider of the Debtor and the sale represents and arms-length transaction between the parties made without fraud and/or collusion.

10. From the sale proceeds the Debtors intend to satisfy the mortgage held by Chase Bank along with any other liens on the property.

**WHEREFORE**, Debtor, respectfully requests that the Court enter an Order: (i) Granting this Motion, (ii) Authorizing the Debtor to sell the Property to the proposed buyer under the terms of that Agreement for the Sale of Real Estate free and clear of liens, claims interests and encumbrances, and, (iii) Granting the Debtor such other and further relief to which they may be justly entitled.

Dated: November 24, 2021

/s/Brad J. Sadek, Esq

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